

# EXHIBIT B

**EXHIBIT B – Defendant Skyscanner, Ltd.’s Proposed Constructions  
to Plaintiff Network Monitoring LLC**

	<b>Claim Terms, Phrases, or Clauses for Construction<sup>1</sup></b>	<b>Patent, Claim Number(s)</b>	<b>Proposed Construction</b>	<b><u>Intrinsic Evidence</u></b>	<b><u>Extrinsic Evidence</u></b>
1.	Skyscanner proposes that claims 1 and 6 of the ’416 Patent and claims 1 and 17 of the ’946 Patent should be construed to limit the scope of these claims to a specific ordered combination. Additionally, Skyscanner proposes the following terms for construction:	’416 Patent, claims 1, 6 ’946 Patent, claims 1, 17	These claims require a specific ordered combination:  <ul style="list-style-type: none"> <li>(1) “providing the user browser with a Web page containing a URL . . .”</li> <li>(2) “determining a Web server URL . . .”</li> <li>(3) “identifying and extracting”;</li> <li>(4) “forming parameter data”;</li> <li>(5) “encoding an original URL as part of the tracking system URL”</li> <li>(6) “embedding the rewritten URLs in the response . . .”</li> <li>(7) “causing the Web page specified by the Web server URL to be returned to the user browser.”</li> </ul>	FIGs. 1, 3, 5.  ’416 Patent, 4:39–63; 6:9–59; 8:57–67; 9:33–10:3; 10:38–65; 11:1–54; 13:65–14:58; 15:5–41; 18:25–19:25.	U.S. Pat. No. 5,991,740
2.	“an original URL”	’416 Patent, claims 1, 6 ’946 Patent, claims 1, 17	“a URL embedded in the response to the Web page request from the user browser”	’416 Patent, 6:9–31.	FC 2616 (June 1999) <a href="https://datatracker.ietf.org/doc/html/rfc2616/">https://datatracker.ietf.org/doc/html/rfc2616/</a> (“non-transparent proxy”)

<sup>1</sup> Changes to claim terms purportedly introduced by certificates of correction are indicated with double-brackets [[]] representing removal and underlining representing insertion.

	<b>Claim Terms, Phrases, or Clauses for Construction<sup>1</sup></b>	<b>Patent, Claim Number(s)</b>	<b>Proposed Construction</b>	<b><u>Intrinsic Evidence</u></b>	<b><u>Extrinsic Evidence</u></b>
					<p>The Authoritative Dictionary of IEEE Standards Terms (Seventh Edition) (December 1, 2000)</p> <p>The Illustrated Dictionary of Electronics (Seventh Edition) (1997)</p> <p>Dictionary of Computing (Fourth Edition) (2002)</p>
3.	<p>“ [[at least one]] a rewritten URL”</p> <p>“the rewritten URL[[s]]”</p> <p>“the rewritten embedded URL[[s]]”</p> <p>“[[each of]] the rewritten embedded URL[[s]]”</p>	<p>’416 Patent, claims 1, 6</p> <p>’946 Patent, claims 1, 17</p>	<p>“[a / the] URL replacing the URL embedded in the response to the Web page request from the user browser”</p>	<p>’416 Patent, 6:9–67.</p>	<p>The Authoritative Dictionary of IEEE Standards Terms (Seventh Edition) (December 1, 2000)</p> <p>The Illustrated Dictionary of Electronics (Seventh Edition) (1997)</p> <p>Dictionary of Computing (Fourth Edition) (2002)</p>

	<b>Claim Terms, Phrases, or Clauses for Construction<sup>1</sup></b>	<b>Patent, Claim Number(s)</b>	<b>Proposed Construction</b>	<b><u>Intrinsic Evidence</u></b>	<b><u>Extrinsic Evidence</u></b>
4.	“form[ing] parameter data based upon pre-determined selection parameters from the database”	’416 Patent, claims 1, 6 ’946 Patent, claims 1, 17	Indefinite		
5.	“dynamically maintain[ing] the pre-determined selection parameters based upon revisable, operator-defined instructions on how to select and extract information from a text page; and analyzing the parameter data sets to predict future user activity”	’416 Patent, claims 5, 10	Indefinite		

	<b>Claim Terms, Phrases, or Clauses for Construction<sup>1</sup></b>	<b>Patent, Claim Number(s)</b>	<b>Proposed Construction</b>	<b><u>Intrinsic Evidence</u></b>	<b><u>Extrinsic Evidence</u></b>
6.	<p>“[[the]] <u>a</u> response”</p> <p>“[[a]] <u>the</u> response”</p> <p>“forwarding the response to the user browser”</p>	<p>’416 Patent, claims 1, 2, 6, 7</p> <p>’946, claims 1, 10, 17, 25</p>	<p>“[a / the] response to the Web page request from the user browser”</p> <p>“forwarding the response from the Web server as the response to the Web page request from the user browser”</p>	<p>FIGs. 1, 3, 5.</p> <p>’416 Patent, 4:39–63; 5:54–64; 6:9–59; 8:28–29; 8:57–67; 9:33–10:3; 10:38–65; 11:1–54; 13:65–14:58; 15:5–41; 18:25–19:25.</p> <p>Certificate of Correction.</p>	
7.	<p>“provide profiling and analysis of at least one session”</p>	<p>’946, claims 1, 17</p>	Indefinite		
8.	<p>“3. The method of claim 1, where the causing the Web page specified by the Web server URL to be returned to the user comprises redirecting the user browser to the Web page on the Web browser.”</p>	<p>’416 Patent, claims 3, 8</p> <p>’946 Patent, claims 11, 26</p>	<p>“responding with a redirect code that causes the browser to automatically send a second request to the tracking system, this time causing the Web page specified by the Web server URL to be returned to the user”</p>	<p>’416 Patent, 13:66–14:26.</p>	

	<b>Claim Terms, Phrases, or Clauses for Construction<sup>1</sup></b>	<b>Patent, Claim Number(s)</b>	<b>Proposed Construction</b>	<b><u>Intrinsic Evidence</u></b>	<b><u>Extrinsic Evidence</u></b>
	<p>“8. The apparatus of claim 6, where the apparatus causes the Web page specified by the Web server URL to be returned to the user by redirecting the user browser to the Web page on the Web browser.”</p> <p>“11. The apparatus of claim 1, where the apparatus causes the Web page specified by the Web server URL to be returned to the user by operations comprising redirecting the</p>				

	<b>Claim Terms, Phrases, or Clauses for Construction<sup>1</sup></b>	<b>Patent, Claim Number(s)</b>	<b>Proposed Construction</b>	<b><u>Intrinsic Evidence</u></b>	<b><u>Extrinsic Evidence</u></b>
	<p>user browser to the Web page on the Web browser.”</p> <p>“26. The method of claim 17, wherein the Web page specified by the Web server URL is returned to the user by operations comprising redirecting the user browser to the Web page on the Web browser.”</p>				